

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
Kameron E. Tolbert)
611 Klamath Way Drive)
Suisun City, CA 94585)
Case No. 2:23-mj-109

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 19, 2022 -August 22, 2022 in the county of Jackson County in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251	Sexual Exploitation of a Minor
18 U.S.C. § 2423(b)	Travel with Intent to Engage in Illicit Sexual Conduct

This criminal complaint is based on these facts:

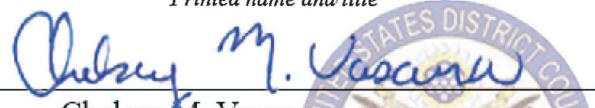
See attached affidavit incorporated herein by reference

Continued on the attached sheet.


Complainant's signature

FBI Special Agent E. Travis Aaron

Printed name and title


Chelsey M. Vascara
United States Magistrate Judge
Judge's signature


Elizabeth XXXXX Preston Deavers, US Magistrate Judge

Printed name and title

Date: 2/21/2023

City and state: Columbus, Ohio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In the matter of:

United States of America : Case No.: 2:23-mj-109
v. :
Kameron E. Tolbert : Magistrate Judge Vascura
611 Klamath Way Drive :
Suisun City, CA 94585 :
:

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, E. Travis Aaron, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows

1. I, Special Agent E. Travis Aaron (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of Title 18 United States § 2251, Sexual Exploitation of a Minor, and Title 18 United States § 2423(b), Travel with Intent to Engage in Illicit Sexual Conduct. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Kameron E. Tolbert (TOLBERT) committed the violations listed above.

2. I am a Special Agent with the FBI assigned to the Cincinnati Division and I have been a Special Agent since September 2018. I am currently assigned to the Resident Agency in Athens, Ohio. Prior to joining the FBI, I worked as a law enforcement officer in varying capacities. I began my law enforcement career in 2012 as a patrol officer in Coulterville, Illinois, where I spent three years working on all case work assigned to my jurisdiction. I transferred to Red Bud, Illinois Police Department in 2015, where I continued as a patrol officer. I helped create an educational program for narcotics that was presented to the local school district, along with certification as an Active Shooter Instructor by 4E. I transferred to Southern Illinois University-Edwardsville in 2016 as a patrol officer. I promoted to a Field Training Officer for the department prior to leaving to accept a position as a Special Agent for the FBI in 2018. While performing my duties as a Special Agent, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses. As part of my duties as a Special Agent, I investigate criminal child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A.

3. In August of 2022, the Jackson County Sheriff's Office (JCSO), received a report regarding an unknown male, who has since been identified as Kameron TOLBERT, jumping through the bedroom window of an approximately 14-year-old female (Minor Victim) in an attempt to escape out of her bedroom.

4. As a result of the call, JCSO was dispatched to a location in Jackson, Ohio and learned that K.H., a family member of Minor Victim, had returned to the residence and found TOLBERT in bed with Minor Victim. K.H. advised that TOLBERT then jumped out of Minor Victim's window and ran to the parking lot of the King's Daughters Medical Specialties facility located across the street. C.H., another family member of Minor Victim, observed this and began following TOLBERT northbound on State Route 93 into Jackson, Ohio. Both K.H. and C.H. described the vehicle TOLBERT was driving as a white SUV. Law enforcement noted the bedroom window TOLBERT was seen fleeing from was broken and further located a pair of male shoes in the bedroom of Minor Victim.

5. While on scene, JCSO spoke with Minor Victim and observed bruising consistent with hickeys on her neck. In a brief interview with Minor Victim, Minor Victim identified TOLBERT as the man that had been in her bedroom, further indicating that TOLBERT lived in Wellston, Ohio. Minor Victim was then taken to Nationwide Children's Hospital for follow-up evaluations and a forensic interview. During the forensic interview, Minor Victim disclosed she had engaged in sexual intercourse with TOLBERT. Law enforcement further learned that Minor Victim and TOLBERT had been in communication since the beginning of the 2022 calendar year.

6. To further the investigation, JCSO contacted the King's Daughters facility to obtain any potential video footage from the parking lot area where TOLBERT had been observed running to and fleeing from. At that point, an employee contacted JCSO and indicated that he/she had observed a white SUV parked in the parking lot the day before the incident and had taken a picture of the license plate. That photo was provided to JCSO, who were able to identify a Michigan license plate bearing license plate number EPU2174 in the photograph. The license plate was registered to a 2022 white Toyota RAV4, belonging to PV Holding Corp via Avis Car Rental.

7. JCSO then notified the school Minor Victim attended to inform them of the situation and to garner assistance in locating TOLBERT. A short time later, JCSO received a notification from the school that the white SUV law enforcement was looking for was in the parking lot of the high school. A School Resource Officer (SRO) was able to approach the vehicle and detain the driver, TOLBERT, until JCSO arrived on scene. After being read his *Miranda* warnings by JCSO, TOLBERT admitted he was at the high school to see Minor Victim. TOLBERT admitted that he left his shoes in Minor Victims' room when he jumped out the window. TOLBERT confirmed that he had not been cut by any glass from the window when he jumped out of it. He further confirmed to JCSO that he was 27 years old. JCSO then transported TOLBERT back to the police station for further questioning.

8. Upon arriving back at the police station, JCSO again advised TOLBERT of his *Miranda* warnings. TOLBERT agreed to speak to law enforcement and indicated he met Minor

Victim approximately six months ago online via the mobile application Discord. TOLBERT indicated he and Minor Victim then continued to chat via Google Photos. TOLBERT stated in August of 2022, he took a flight from Sacramento, California to Columbus, Ohio. TOLBERT admitted that he would travel to the parking lot of King's Daughters in Jackson, Ohio, park his vehicle and walk to the Minor Victim's residence. TOLBERT indicated that he was aware of a camera on the door of the residence of Minor Victim, so he would crawl through the bedroom window of Minor Victim to avoid any detection. TOLBERT disclosed to law enforcement he had engaged in sexual intercourse with Minor Victim on multiple occasions and he came to Jackson, Ohio to meet Minor Victim in person to assess how they would interact. TOLBERT also indicated his shoes and backpack with his ID were still at the Minor Victim's residence.

9. Based on the information obtained from TOLBERT in the interview, JCSO detectives traveled to Minor Victim's residence and obtained TOLBERT's backpack and shoes from Minor Victim's bedroom.

10. Upon returning to the police station with TOLBERT's items, JCSO continued to speak with TOLBERT. TOLBERT identified the backpack and all contents within it as his and consented to a search of the backpack. JCSO located four digital media devices inside of the backpack, including an Acer Predator Laptop Computer, PNY 32 GB USB thumb drive, Samsung 256 GB USB thumb drive and a GoPro recorder. TOLBERT also informed JCSO that he believed Minor Victim still had his cellular phone. Based on that information, JCSO traveled back to Minor Victim's residence and retrieved an Apple iPhone belonging to TOLBERT.

11. In September of 2022, JCSO obtained a state search warrant for TOLBERT's digital media devices located inside of the backpack. During review of the Samsung USB thumb drive, law enforcement identified a folder titled "KICK" which was reviewed further due to investigators' knowledge of an application called "KIK" which is often used for messaging. The "KICK" file was opened in an attempt to locate potential evidence and possible communications between TOLBERT and Minor Victim. Within that "KICK" folder was a file entitled "1_5155682165735996543" which contained a video of a prepubescent child dancing naked and behaving in a lascivious manner. JCSO then stopped their review of the device and contacted your affiant for assistance into the investigation into possible additional child sexual abuse materials.

12. In September of 2022, your affiant met with JCSO detectives and took custody of the digital media devices outlined above that belonged TOLBERT. Your affiant obtained a federal search warrant for all the above-listed digital media devices and began reviewing them. During the review, it was discovered both the Samsung 256 USB thumb drive and the iPhone belonging to TOLBERT, contained multiple folders containing videos and images of pre-pubescent and pubescent minors posing nude and engaging in sex acts including masturbation and sexual penetration with other minors and adults.

13. Further investigation revealed the iPhone X contained multiple images and videos of TOLBERT engaging in sex acts with Minor Victim. One video, approximately one-minute in length titled "8da8e09c76309b7495d1673adc3cdfe.decrypted" depicted Minor Victim wearing a t-shirt with a "US Army" and "star emblem" on the right side of the shirt. Minor Victim was

nude from the waist down and TOLBERT was observed digitally penetrating Minor Victim's vagina. Metadata revealed the video originated in the Snapchat application and was uploaded on August 22, 2022. At the time, Minor Victim would have been approximately 14 years old.

14. Your affiant also recovered another video, approximately twenty-three seconds in length, on the iPhone X, titled "0fdc3fd9eac0e0a8417eefb42a47de0c.decrypted," which depicted Minor Victim and TOLBERT engaged sexual intercourse, specifically vaginal sex. Metadata revealed the video originated in the Snapchat application and was uploaded on August 22, 2022. At the time, Minor Victim would have been approximately 14 years old.

15. In October of 2022, your affiant interviewed Minor Victim at JCSO. Minor Victim disclosed she communicated with TOLBERT on different social media platforms, including Snapchat, Google Photos, and Discord.

16. Throughout the course of the investigation, legal process had been served to numerous social media platforms for account information related to both the Minor Victim and TOLBERT. Further search warrants for content were also served to Google and Discord for the accounts attributed to TOLBERT. Upon receiving the return results for TOLBERT's Discord account, your affiant noted that he and Minor Victim exchanged messages between February 2022 and August 2022. In an exchange which occurred on February 8, 2022, the following communications were noted:

TOLBERT: Do you ever get to hangout with friends often
Minor Victim: yeah
TOLBERT: What about any relationship with a significant other
Minor Victim: nope... i dont have one
TOLBERT: Did you have any potential people in mind
Minor Victim: not really...I have the urge to take a titty picture....
TOLBERT: I mean I dont really see a problem in taking them the real
dilemma is what you do with them after that
Minor Victim: I have no idea... boobies
TOLBERT: Are you saying that about yours
Minor Victim: yes...boobies...yummy
TOLBERT: Im sure yours are. Has anyone seen them before
Minor Victim: uh.. a few people..my tiddies are cute ig....
TOLBERT: anything you choose to send me. Im always accepting of
anything you choose to send me. Just sayin
Minor Victim: im gonna sending you boobies. send*

Your affiant would note that an image depicting a female posing topless and her nude breasts exposed was distributed from the Minor Victim's account to TOLBERT's account. No face was visible in the image. In response to receiving the image, the following conversation ensued:

TOLBERT: Those look absolutely amazing
Minor Victim: boobies
TOLBERT: I see why you say they are yummy

Minor Victim: hehe
TOLBERT: I could legit hold them all day
Minor Victim: hehehhehehehe....no way
TOLBERT: Well Ill just say yours are probably the best ever
Minor Victim: good

17. Your affiant further recovered a conversation between Minor Victim and TOLBERT occurring on or about August 19, 2022. In that conversation, the following exchange occurred:

TOLBERT: Hi
Minor Victim: Hello
Minor Victim: i gtg....bye
TOLBERT: Okay have a good day at school. Message me when you get there. Getting ready to fly now message you when I land.
TOLBERT: Bout to get on the last plane soon Ill let you know when I land and get the car and stuff
Minor Victim: Ok
TOLBERT: You dont seem very excited to see me
Minor Victim: i am I just want yo ass to hurry
TOLBERT: Im trying alright in the plane now just waiting to leave. Alright plan taking off now message you when I land.
Minor Victim: wait how much longer
TOLBERT: Not sure yet plane just got delayed again
Minor Victim: OMFG. HOW DO YOU NOT KNOW. Yk what. Good. Bye.

18. The conversation continued into the next day between Minor Victim and TOLBERT and is noted as followed:

TOLBERT: Itll be 2 hours and 17 minute flight the estimate time will be 10:52pm. Your time
Minor Victim: than you. Gd. Hurry. Punk
TOLBERT: Ill keep you updated
Minor Victim: Punk
TOLBERT: Im finna beat you ass when I get there
Minor Victim: Mhm sure. Hurry. If im sleep when you get here just come up and tap on my window.
TOLBERT: I just landed now waiting for them to let us off. If was a lot to deal with but I got the car and on my way now.
TOLBERT: [Minor Victim] im here.
Minor Victim: im up
TOLBERT: Im parked across the street
Minor Victim: If u need me I'll b waiting
TOLBERT: Okay. The only one. You want OJ flavor thats like the only one
Minor Victim: Yeah. Hurry. Rn.
TOLBERT: Whats with the shark
Minor Victim: idk. Hurry

TOLBERT: Im across the street
Minor Victim: Go ahead and come in
TOLBERT: I see someone where the pool table is
Minor Victim: theyr gone. Go. Mf hurry. KAMERON. Ily
TOLBERT: Ily too. Everything okay
Minor Victim: yees

19. In addition to the above messages between TOLBERT and Minor Victim regarding his flight and arrival to Ohio, your affiant obtained records from United Airlines which revealed that on or about August 6, 2022, TOLBERT purchased an airline ticket to travel from Sacramento, California to Columbus, Ohio on August 19, 2022. TOLBERT also purchased a return airline ticket to travel on August 25, 2022, from Columbus, Ohio to Sacramento, California.

20. Law enforcement further obtained records from Goldman Sachs Bank, the issuing bank of a credit card belonging to TOLBERT, and learned that on August 19, 2022, TOLBERT used the credit card to make a purchase a rental car through Budget Rent-A-Car, a subsidiary of Avis Budget group. As indicated above, this was verified when law enforcement located TOLBERT in the parking lot of Minor Victim's school in the white SUV, specifically 2022 white Toyota RAV4, belonging to PV Holding Corp via Avis Car Rental.

21. Based upon the above information, your affiant submits that there is probable cause to believe Kameron E. TOLBERT has committed violations of Title 18 United States § 2251, Sexual Exploitation of a Minor, and Title 18 United States §§ 2423(b), Travel with Intent to Engage in Illicit Sexual Conduct. Therefore, your affiant respectfully requests this court to issue a criminal complaint and arrest warrant.

SA E. Travis Aaron
E. Travis Aaron
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 21st day of February 2023.

Chelsey M. Vascura
The Honorable ~~Elizabeth Paxton Dax~~ Chelsey M.
United States Magistrate Judge Vascura
United States District Court
Southern District of Ohio